

# **EXHIBIT 1**

STATE OF INDIANA	)	IN THE ALLEN CIRCUIT COURT
	) SS:	2024 TERM
COUNTY OF ALLEN	)	CAUSE NO.: 02C01-2405-DC-000611

IN RE THE MARRIAGE OF	)
	)
RYAN V. JUMPER,	)
Petitioner,	)
	)
and	)
	)
ERIN KATHRYN O'DONNELL,	)
Respondent.	)

**VERIFIED EMERGENCY PETITION FOR TEMPORARY  
POSSESSION AND DAILY OPERATIONS OF THE PARTIES' BUSINESS,  
JUMPSTART COMMUNICATIONS, LLC**

COMES NOW the Respondent, ERIN K. O'DONNELL ("Respondent"), and being first duly sworn upon her oath, deposes and says:

1. The Petitioner, Ryan V. Jumper ("Petitioner") and Respondent are equal owners of Jumpstart Communications, LLC ("business").
2. Since April 7, 2024, Respondent has reason to believe that unless Petitioner is enjoined from so doing, he will attempt to intentionally dissipate, transfer, encumber, sell, conceal, and dispose of Jumpstart Communications, LLC so as to render impossible a determination of property rights of the parties.
3. Since April 7, 2024, Respondent has the following evidence to show the Court that it is in the best interest of the parties' business, Jumpstart Communications, LLC, including their customers, employees, independent contractors and potential clients, that Respondent be granted emergency temporary possession of Jumpstart Communications, LLC and the temporary authority to operate the daily operations of Jumpstart Communications, LLC:

- a. From April 7, 2024, to April 10, 2024, the Petitioner blocked all communication with the Respondent.
- b. On April 8, 2024, Petitioner failed to answer a call from a coax splicer.
- c. On April 12, 2024, there is video of the Petitioner on the business shop camera removing a bag of drugs from a truck. Upon Respondent confronting Petitioner about the drugs, he turned off the business shop cameras and changed the password on the Xfinity security cameras at the business shop.
- d. On April 16, 2024, Petitioner unilaterally changed the password on the business Capital One account and disconnected the Capital One business account from QuickBooks. Employees of Jumpstart Communications, LLC have Capital One business credit cards that need to be used and timely paid.
- e. On April 18, 2024, the Petitioner locked up the 3 Rivers bank accounts (Joint business checking and Joint business money market) so the Respondent could not access such to make payroll and pay bills.
- f. On April 19, 2024, the Petitioner changed the password on Respondent's business email and locked her company credit card.
- g. On April 20, 2024, Petitioner unilaterally fired an aerial foreman at Jumpstart Communications LLC.
- h. On April 21, 2024, Petitioner locked Respondent out of the Xfinity account (home internet used for business) and paused all devices.
- i. On April 21, 2024, Petitioner unilaterally met with four (4) employees, in an attempt to turn them against the Respondent.
- j. On April 23, 2024, the parties met with their business attorney, Matt Elliott, and agreed that Petitioner could come to the marital residence from 8am to 2pm to work from home and have scheduled calls each night at 8:30 p.m. to work on the marriage. Petitioner did not come to the marital residence to work.
- k. On April 24, 2024, the Petitioner continually harassed an employee at 3 Rivers falsely alleging that Respondent was stealing money which resulted in the lock down of the funds in the 3 Rivers business money market account.
- l. On April 25, 2024, the Petitioner changed the password to the common admin email so that Respondent could not access the business email or the payroll spreadsheet tied to the account (Google Sheets).
- m. On April 26, 2024, Petitioner erased Respondent's iPad.

- n. On April 27, 2024, the Petitioner unilaterally made a charge to Avis Rental for \$4,500.00 for a rental vehicle.
- o. On April 29, 2024, the Petitioner texted a new business employee and called Respondent a “cunt”.
- p. On April 29, 2024, the Petitioner texted the business accountant and called the Respondent a “bitch and two-faced cunt”.
- q. On April 29, 2024, the Petitioner threw items at Respondent’s vehicle and broke her side mirror.
- r. **On April 30, 2024, an Ex Parte Order for Protection was entered for Respondent against the Petitioner in Case No. 02D09-02404-PO-001293.**
- s. **On April 30, 2024, the Petitioner was charged with Possession of Paraphernalia I.C. 35-48-4-8.3(B)(1) in Case No. 02D04-2404-CM-001897.**
- t. On April 30, 2024, the Petitioner unilaterally changes the door codes at the Maplecrest Road business shop.
- u. On May 1, 2024, and May 3, 2024, the Petitioner changed the password to the common admin email so that Respondent could not access the business email or the payroll spreadsheet tied to that account (Google Sheets).
- v. On May 5, 2024, the Petitioner unilaterally locked the business Verizon account and removed the Respondent as an authorized user. The Respondent was unable to obtain a hotspot that was necessary for a splicer’s job without opening a new Verizon account.
- w. On May 6, 2024, the Petitioner texted the Respondent as well as two (2) business employees and falsely alleged that she was stealing money. In addition, the Petitioner threatened to dissolve the business.
- x. On May 6, 2024, the Petitioner hired a Private Investigator who attempted to place a tracker on Respondent’s vehicle.
- y. On May 7, 2024, the Petitioner advised the Kansas City CM of the business that he was sending an aerial crew but failed to do so. The Respondent located an aerial truck and obtained a plane ticket for an employee to come and drive the aerial truck to the necessary location. The Petitioner texted the Respondent calling her derogatory names. Petitioner demanded that the employee take a different truck, however, it was not available. The employee

had to spend an extra day in Fort Wayne and obtained a truck in Columbus from another crew.

- z. On May 7, 2024, the Petitioner locked Respondent out of the business Capital One account.
- aa. On May 7, 2024, the Kansas City CM for the business expressed his concern as to the Petitioner's behavior.
- bb. On May 8, 2024, the Director of Zayo (business customer), called the Petitioner asking for outages to be billed within 24 hours. Petitioner promised the client that the billing would be completed, however, he failed to complete such. Instead, the Respondent completed the billing.
- cc. On May 8, 2024, a business employee reported that the GPS was ripped out of his truck. The Petitioner had previously used the employee's truck.
- dd. On May 8, 2024, the Petitioner unilaterally changed the Access Indiana business password which is necessary for the Respondent to be able to access to file business entity reports and pay estimated taxes.
- ee. On May 9, 2024, the Petitioner sent an email to Altec about getting a truck for a new company.
- ff. On May 9, 2024, Petitioner unilaterally withdrew \$10,000 from account XX66.
- gg. On May 9, 2024, Petitioner emailed a client's PM stating that "my wife has taken it upon herself to do things she's not supposed to".
- hh. On May 9, 2024, Petitioner emailed a client's AP about not knowing what Respondent was doing with the checks.
- ii. On May 9, 2024, Petitioner emailed a client's AP questioning deposits.
- jj. On May 9, 2024, Petitioner sent multiple emails from the business to the business questioning transactions from 2-3 years ago while Respondent was working.
- kk. On May 10, 2024, Petitioner emailed the parties' business attorney, Matt Elliott and the Respondent stating that he was checking into Parkview Behavioral Health. However, Petitioner failed to check into Parkview Behavioral Health and instead went to Indianapolis, Indiana.
- ll. On May 10, 2024, the business accountant advised the Respondent that he had been threatened by the Petitioner and would not continue as the accountant if

Petitioner's behavior continues. Ultimately, the business accountant blocked Petitioner.

- mm. On May 10, 2024, late into the evening, the Petitioner sent emails that he is starting a new company and will bury the Respondent. The Petitioner advises a business client that he intends to freeze the bank accounts and take Respondent out of the business.
- nn. On May 10, 2024, Respondent received an email from a third aerial crew asking if the business was fine and if their jobs were secure.
- oo. On May 11, 2024, Respondent received a call from the Director of a business client regarding a concerning call from the Petitioner.
- pp. On May 11, 2024, Respondent unilaterally had Accent lock Respondent out of the Microsoft account. Accent fired the business.
- qq. On May 11, 2024, the Petitioner withdrew the sum of \$59,000 from the business account XX66 leaving a remaining balance of \$455.00.
- rr. On May 11, 2024, the business attorney, Matt Elliott drafted a resolution to have the 3 Rivers bank accounts unlocked, however Petitioner refused to sign.
- ss. On May 11, 2024, the Petitioner crashed the Avis rental vehicle in Greenwood, Indiana.
- tt. On May 12, 2024, the Petitioner unilaterally obtains another rental vehicle from Enterprise.
- uu. On May 12, 2024, the Petitioner sent multiple inappropriate texts to the Respondent.
- vv. On May 13, 2024, the Respondent transferred a client's deposits into personal account to pay business expenses and payroll.
- ww. On May 14, 2024, the Petitioner threatened a business employee to report his truck stolen.
- xx. On May 14, 2024, the Petitioner unilaterally fired an employee and rehired another employee.
- yy. On May 14, 2024, the Petitioner contacted a business client and advised that the parties were getting a divorce and that the Respondent was attempting to steal the company.

- zz. On May 15, 2024, the Petitioner texted seven business employees and falsely alleged that Respondent had hacked his phone and that the employees should check to see if their phones had been hacked.
- aaa. On May 16, 2024, the Petitioner orders three new business phones to replace three new phones that he believed had been hacked.
- bbb. On May 16, 2024, the Petitioner texts three business employees regarding Respondent locking him out of email accounts.
- ccc. On May 18, 2024, the Respondent received information that one of the business employees was staying away from the shop as he could not deal with the Petitioner's behavior.
- ddd. On May 21, 2024, the Petitioner texted and emailed several of the business employees alleging that the Respondent was starting a new company.
- eee. On May 22, 2024, the Petitioner accuses the Respondent of starting a new company. The Petitioner submits false texts to the business bankers.
- fff. On May 22, 2024, the business attorney, Matt Elliott, and the Respondent try and have the Petitioner sign a fiduciary to unlock the 3 Rivers bank accounts, however, Petitioner refused to sign such.
- ggg. On May 23, 2024, the business shop rent in Cincinnati, Ohio is returned due to the Chase account being frozen by the Petitioner. Petitioner removed Respondent from the Chase account.
- hhh. **On May 24, 2024, Petitioner was charged with Possession of Methamphetamine I.C. 35-48-4-6.1, Possession of a Narcotic Drug I. C. 35-48-4-6(a), and Operating a Vehicle While Intoxicated Endangering a Person I.C. 9-30-5-2(a) & (b) in Case No. 48C05-2405-F6-001613.**
- iii. On May 27, 2024, Petitioner sends inappropriate texts to the business attorney, Matt Elliott calling the Respondent, a "hairy cunt bitch, long lip bitch, bag of saggy tits".
- jjj. On May 27, 2024, Petitioner moves the parties' camper to the Chain O Lakes.
- kkk. On May 28, 2024, the Petitioner pauses the Respondent's work internet.
- lll. On May 30, 2024, the Petitioner met with a client and advised them that he was splitting from the Respondent and starting a new company. The client questions whether or not they work for the Petitioner or the Respondent.

- mmm. On May 30, 2024, Respondent receives a City Utilities payment returned because the Petitioner locked her credit card.
- nnn. On May 30, 2024, Petitioner requested a password change on Respondent's personal email account.
- ooo. On May 30, 2024, Petitioner paused the Respondent's backup computer.
- ppp. On May 31, 2024, Petitioner suspended Respondent's phone number.
- qqq. On June 3, 2024, the Maplecrest shop's electric bill payment is returned due to Petitioner freezing the accounts.
- rrr. On June 3, 2024, Respondent is informed that Petitioner is two months behind on the lawn care bill at the shop.
- sss. On June 4, 2024, QuickBooks cancels the Respondent's ability to use bill pay due to multiple returned payments while accounts are frozen.
- ttt. On June 4, 2024, the business insurance broker calls the Respondent about damage to a truck and advised her to pay the damage out of pocket as they have two other recent claims. Petitioner had an accident and unilaterally filed an insurance claim without the Respondent's knowledge. The insurance broker was concerned as to Petitioner's unusual behavior.
- uuu. On June 4, 2024, the Petitioner sends emails to all attorneys involved stating that he will freeze the bank accounts.
- vvv. On June 4, 2024, the Petitioner unilaterally fires the business attorney, Matt Elliott.
- www. **On June 6, 2024, Petitioner was charged with Possession of Cocaine b/t 10 & 28 grams of cocaine I.C. 35-48-4-6(a)/F4, Operating a Vehicle with a Schedule I or II Controlled Substance or its Metabolite I.C. 9-30-5-1(c)/MC, and Possession of Paraphernalia I.C. 35-48-4-8.3(b)(1)/MC in Case No. 48C06-2406-F4-001720.**
- xxx. On June 6, 2024, a business UG foreman texts the Respondent asking if the business was ok and if their jobs were secure.
- yyy. On June 8, 2024, the Respondent receives a call from the Indiana DNR regarding the abandoned camper. The Respondent had to made arrangements to close up the camper and tow it.
- zzz. After his third arrest since April 30, 2024, the Petitioner admits himself into Landmark Recovery in Indianapolis, Indiana for a 10 day treatment plan.



- aaaa. On June 12, 2024, while in rehab, the Petitioner pays the credit card bill with Chase checking which resulted in the account being short for the payroll draft.
- bbbb. On June 12, 2024, Petitioner made two transfers of \$3,400.00 and \$2,500.00 from XX66 to XX00.
- cccc. On June 12, 2024, a business employee found a crack pipe in his work truck that Petitioner had just used.
- dddd. On June 12, 2024, the Petitioner send a text message to 12 of the business customers telling them that they needed to be copying him at jumpstarttelecom@yahoo.
- eeee. On June 13, 2024, while in rehab, the Petitioner demands that the business DO book him a flight for a meeting with a client.
- ffff. On June 14, 2024, the employees of the business express concern about Petitioner leaving rehab without completing the program. Some of the employees express that Petitioner should not be allowed back in the business due to his actions that were detrimental toward the business.
- gggg. On June 17, 2024, the Petitioner leaves Landmark Recovery in the seventh day of rehab and returns to the business shop.
- hhhh. On June 18, 2024, the Petitioner changed the home internet password.
- iiii. On June 18, 2024, the Petitioner threatens to dissolve the business.
- jjjj. On June 18, 2024, the Petitioner interrogates the business DO about starting a new company with the Respondent. The Respondent receives a call from a business client stating that Petitioner does not have the right to ruin everything for the business and then jump back in when he feels like it.
- kkkk. **On June 20, 2024, the Petitioner failed to appear for the Status Conference in Case No. 02D04-2404-CM-001897 and a warrant was taken under advisement.**
- llll. On June 20, 2024, Petitioner with counsel and Respondent with counsel met to discuss the operating of the business and Petitioner returning to rehab. The parties agreed that the Petitioner would enter rehab at Landmark Recovery for the 35-day program and that the program would be paid by MD Wise. During the 35-day program, the Respondent shall operate the business with all of the current employees in place. During the 35-day program, Petitioner shall refrain from contacting the Respondent, employees, potential clients, current clients, and sub-contractors. The Respondent shall provide the Petitioner's

counsel with any documentation requested as to the operation of the business. Upon the Petitioner receiving an assessment from Landmark that he has successfully completed the program, the parties and counsel shall reconvene to discuss counseling for the parties, possible dismissal of the protective order, and Petitioner's involvement in the future operation of the business.

mmmm. On the evening of June 20, 2024, the Petitioner sent multiple volatile emails to the Respondent. Further, the Petitioner failed to enter into rehab at Landmark Recovery as previously agreed upon. The Petitioner sent an email to the business DO to Cease & Desist any involvement in the business except for sales.

nnnn. **On June 25, 2024, Petitioner was charged with Unlawful Possession of Use of a Legend Drug I.C. 16-42-19-13/F6, Operating a Vehicle While Intoxicated Endangering a Person I.C. 9-30-5-2(a)/MA, Possession of a Controlled Substance-Possession of a Schedule I, II, III, or IV I.C. 35-48-4-7 (a)/MA, Possession of Paraphernalia I.C. 35-48-4-8.3(b)(1)/MC, Driving While Suspended I.C. 9-24-10-1/FA, and Unlawful Stopping/Parking/Standing of Vehicle on Traveled Part of Highway I.C. 9-21-16-1/IFC in Case No. 32C01-2406-F6-000594.**

oooo. **On June 26, 2024, Petitioner was charged with Invasion of Privacy-violates an Ex Parte Protective Order and there is an active warrant in Case No. 02D04-2406-CM-002804.**

pppp. **On July 1, 2024, the State of Indiana filed a Motion to Revoke Defendant's Release on Bond in Case No. 48C06-2406-F4-001720.**

qqqq. **Currently, the Petitioner is being held in the Hendricks County Jail.**

rrrr. **From April 5, 2024 to June 18, 2024, the Petitioner withdrew from the business the sum of \$139,450.00.**

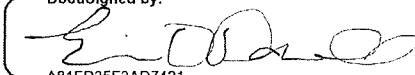
ssss. The banker for the business accounts advised the Respondent that the operating loan can not be used until she is granted temporary possession of the business and granted the temporary authority to maintain the daily operations.

4. The Respondent believes that the Petitioner will continue to interfere with the operation of the business and cause great damage unless she is granted temporary possession of the business and the temporary authority to maintain the daily operations.

5. An immediate and irreparable loss will result to the parties' business if an Emergency Order is not entered to grant the Respondent temporary possession of the business and the temporary authority to maintain the daily operations.

WHEREFORE, Respondent prays that the Court issue an Emergency Order granting her temporary possession of the business, Jumpstart Communications, LLC and grant her the temporary authority to operate the daily operations without the interference of the Petitioner, to prohibit the Petitioner from having access to the business bank accounts, business email accounts, business phones, business employees, business clients, business sub-contractors, business potential clients, business charge cards, business cameras, business internet, business shops and yards, and for all relief which the Court may deem proper in the premises.

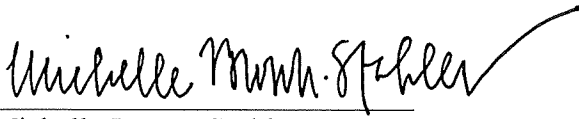
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Erin K. O'Donnell

**CARSON LLP**

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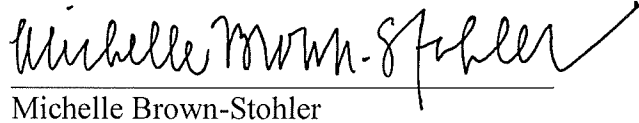


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Attorney for Petitioner

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 2<sup>nd</sup> day of July 2024, a true and exact copy of the foregoing was served upon the following:

Suzanne Wagner  
Via IEFS

  
Michelle Brown-Stohler